

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
TEXAS AMARILLO DIVISION

UNITED STATES AMERICA

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vs.

GRANT LEONARD GLOVER

Case No. 2:21-CR-45-Z (2)

UNOPPOSED MOTION TO WITHDRAW

1. On January, 4, 2022, Undersigned Counsel met with Defendant personally at the jail. The meeting lasted two hours and related to objections to the Presentence Investigation Report. Undersigned Counsel and Defendant agreed to discuss the Objections again prior to filing and after discussing same with the Probation Officer.
2. On January 5, 2022, a serious conflict arose between Retained Counsel and Defendant GRANT LEONARD GLOVER. On that date, Defendant expressed differences with Retained Counsel over proposed objections related to the Presentence Investigation Report, and further stated that he has lost confidence in Retained Counsel's representation of him due to these differences. Defendant also accused Retained Counsel of unethical behavior including "tricking him" and failing to perform duties and obligations as his attorney.
3. On January 6, 2022 Defendant received (via hand delivery) Defendant's Objections to Presentence Investigation Report and was advised that Undersigned Counsel was prepared to file said objections prior to the current deadline of January 10, 2022. Defendant instructed Undersigned Counsel to refrain from filing the objections, file a Motion for Continuance of the Objections deadline and a Motion to Withdraw as his Counsel.

4. On January 7, 2022 Undersigned Counsel filed a Motion To Extend The Time For Filing Objections.

5. On January 8, 2022, Undersigned Counsel called Defendant requesting that he once again review the proposed objections and consider filing same in the event he hasn't received a ruling on his Motion To Extend before the deadline. The proposed objections were previously agreed to in person by the Defendant during the two-hour in person meeting at the jail. Defendant agreed to again review the proposed objections and have his final decision by the deadline on Monday, January 10, 2022.

6. Undersigned Counsel contacted Defendant via telephone on Monday, January 10, 2022 for his instructions. Defendant advised Undersigned Counsel to withdraw as his attorney and refrain from filing the objections. Undersigned Counsel advised Defendant that he had not yet obtained a ruling from the Court on the Motion To Extend and that Defendant risked losing his right to object if Undersigned Counsel didn't file the proposed Objections. Defendant acknowledged his understanding and again instructed Undersigned Counsel to refrain from filing the objections and to proceed to file this Motion to Withdraw as Counsel.

7. To say the least, meaningful communications are no longer possible and irreconcilable conflicts of interest exist. Thus, Retained Counsel is ethically required to withdraw.

3. Disciplinary Rules of Professional Conduct, Rule 1.15(a)(3) states: A lawyer shall decline to represent a client or, where representation has commenced, shall withdraw ... if the lawyer is discharged, with or without good cause. Since, Retained Counsel has been discharged, he is obligated to withdraw pursuant to Texas Disciplinary Rules of Professional Conduct.

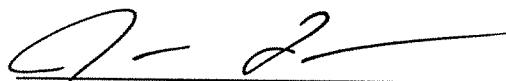
#### **PRAYER FOR RELIEF**

For the reasons described above, Retained Counsel seeks leave to withdraw his representation of Defendant. Defendant has advised that he will retain new counsel or request

Appointed Counsel to represent him in this action.

Respectfully submitted,

**QUACKENBUSH LAW FIRM**  
**Jesse L. Quackenbush**  
**Texas State Bar No. 16421975**  
**801 S. Fillmore, Suite 460**  
**Amarillo, Texas 79101**  
**Telephone: (806) 374-4024**  
**Facsimile: (806) 352-0073**  
**Email: jesseqlf2020@gmail.com**



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Jesse L. Quackenbush

**CERTIFICATE OF CONFERENCE - DEFENDANT**

On this 10<sup>th</sup> day of January, 2022, I conferred with Defendant GRANT LEONARD GLOVER. He

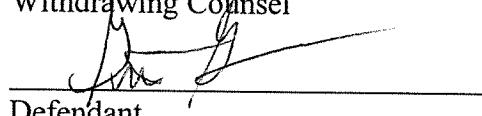
AGREES  OPPOSES \_\_\_\_\_

This motion to withdraw as counsel.



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Withdrawing Counsel

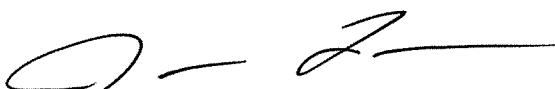


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Defendant

**CERTIFICATE OF CONFERENCE - GOVERNMENT**

On this 10th day of January, 2022, I conferred with AUSA Anna Marie Bell, and the Government does not oppose nor agree to this motion.

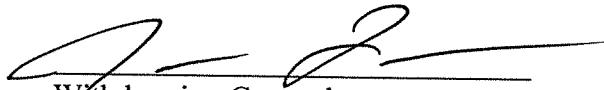


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Withdrawing Counsel

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> day of January, 2022, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court.



Withdrawing Counsel